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6 Attorney for Non-Party Meta Platforms, Inc.

7 Attorneys for Plaintiff

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 IN RE: SUBPOENA TO META PLATFORMS,
12 INC.

) Misc. No. 3:23-mc-80127-LJC

13 IN CONNECTION WITH

) Case No. 2:22-cv-00412-RFB-BNW
Pending in the District of Nevada

14 EVERETT BLOOM,

) **JOINT STIPULATION AND
[PROPOSED] ORDER RE: MOTION
TO COMPEL**

15 Plaintiff,

)
16 v.
) Judge: The Honorable Lisa J. Cisneros
17 , ZUFFA, LLC, Defendant.) Hearing Date: June 22, 2023
18) Time: 1:30 p.m.
19) Place: Zoom Videoconference
20)
21) Complaint Filed: March 4, 2022 (D. Nev.)
22)
23)
24)
25)
26)
27)
28)

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1 WHEREAS, on April 25, 2023, Plaintiff Everett Bloom filed a motion to compel non-party
2 production and deposition by Meta Platforms, Inc. in connection with *Bloom v. Zuffa, LLC*, Case
3 No. 2:22-cv-00412-RFB-BNW (D. Nev.);

4 WHEREAS, the Court issued an order on May 2, 2023 directing Plaintiff to serve his
5 motion to compel on Meta and file proof of service no later than May 9, 2023 and directing the
6 parties to file a consent or declination form indicating whether they consented to the jurisdiction
7 of the Magistrate Judge in this matter by May 23, 2023;

8 WHEREAS, Plaintiff and Meta each consented to the jurisdiction of the Magistrate Judge
9 in this matter on May 23, 2023;

10 WHEREAS, on May 25, 2023, the Court set a briefing schedule and hearing on Plaintiff's
11 motion to compel;

12 WHEREAS, pursuant to the Court's May 25, 2023 order, Meta's brief in opposition to the
13 motion to compel currently is due no later than June 8, 2023 and Plaintiff's reply brief is due no
14 later than June 15, 2023;

15 WHEREAS, the hearing on Plaintiff's motion to compel currently is scheduled for June
16 22, 2023 at 1:30 PM PST by Zoom videoconferencing;

17 WHEREAS, Plaintiff and Meta are actively discussing resolution of Plaintiff's current
18 motion to compel and subpoena;

19 WHEREAS, Plaintiff and Meta parties have conferred and agreed that an extension of the
20 briefing schedule and hearing date would allow them to continue their discussions;

21 WHEREAS, Plaintiff and Meta have agreed, subject to the Court's approval, to extend
22 Meta's deadline to file its opposition to the motion to compel to June 22, 2023; to extend Plaintiff's
23 deadline to file a reply in support of the motion to compel to June 29, 2023; and to continue the
24 hearing on the motion to compel to July 6, 2023, at 1:30 p.m., via Zoom videoconferencing.

25 WHEREAS, there is good cause in support of an extension of the briefing schedule and
26 hearing, namely, to facilitate Plaintiff's and Meta's ongoing discussions to resolve Plaintiff's
27 motion to compel and subpoena;

1 WHEREAS, the proposed extension will not prejudice the interests of the parties or the
2 Court;

3 WHEREAS, there have been no extensions granted in this matter to date;

4 NOW, THEREFORE, pursuant to Civil L.R. 6-2 and subject to the approval of the Court,
5 Plaintiff and Meta, by and through their respective counsel, hereby stipulate and agree to extend
6 Meta's deadline to file a brief in opposition to the motion to compel to June 22, 2023; extend
7 Plaintiff's deadline to file a reply brief in support of the motion to compel to June 29, 2023; and
8 to reset the hearing on this matter to July 6, 2023, at 1:30 pm, via Zoom videoconferencing.

9 Accordingly, Plaintiff and Meta respectfully request that the Court issue an order extending
10 the deadlines and resetting the hearing.

11 Dated: June 5, 2023

JENNER & BLOCK LLP

12 By: /s/ Laurie Edelstein

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22 *Attorneys for Meta Platforms, Inc.*

23 Dated: June 5, 2023

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29 *Attorneys for Plaintiff*

[PROPOSED] ORDER

Having considered the parties' Stipulation, and good cause appearing therefore, the Court hereby **GRANTS** the parties' Stipulation. It is **HEREBY ORDERED** that:

1. Meta Platforms, Inc.'s deadline to file a brief in opposition to the motion to compel is extended to June 22, 2023;

2. Plaintiff Everett Bloom's deadline to file a reply brief in support of his motion to compel is extended to June 29, 2023;

3. The hearing for this matter is reset to July 6, 2023, at 1:30 pm, via Zoom videoconferencing.

IT IS SO ORDERED.

Dated: _____

The Honorable Lisa J. Cisneros
United States Magistrate Judge

FIGURE 1

FIGURE 1

Pursuant to Local Rule 5-1(h)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories shown above and that all signatories have authorized placement of their electronic signatures on this document.

By: /s/Laurie Edelstein
Laurie Edelstein

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